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DOC #:

DATE FILED: 6-3-05

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UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

In re Terrorist Attacks on September 11, 2001

03 MDL 1570 (RCC)

ECF Case

This document relates to:

Federal Insurance Co., et al. v. Al Qaida, et al., Case No. 03-CV-6978 (S.D.N.Y.)

Euro Brokers, Inc., et al. v. Al Baraka Investment and Development Corp., et al., Case
No. 04-CV-07279-UA (S.D.N.Y.)

New York Marine and General Insurance Co. v. Al Qaida, et al., Case No. 04-CV-6105 (S.D.N.Y.)

World Trade Center Properties, LLC, et al. v. Al Baraka Investment and Development Corporation, et al., Case No. 04-CV-7280 (S.D.N.Y.)

STIPULATION AS TO SERVICE OF PROCESS AND RICO STATEMENTS RELATING TO COMPLAINTS CONSOLIDATED UNDER MDL 1570

IT IS HEREBY STIPULATED AND AGREED, by and between Plaintiffs in all of the above-referenced cases consolidated under 03 MDL 1570 and Defendant Yousef Jameel, by and through their undersigned counsel, that the undersigned Defendant's counsel hereby agrees that Mr. Jameel was served with the Complaint in each of the cases referenced above. Mr. Jameel expressly reserves his right to assert all other defenses to the Complaints, including, but not limited to, lack of personal jurisdiction.

IT IS FURTHER HEREBY STIPULATED AND AGREED that Plaintiffs pursuing claims for relief under the Racketeer Influenced and Corrupt Organizations Act ("RICO") shall serve their respective RICO Statements concerning Mr. Jameel, on or before June 3, 2005.

IT IS FURTHER HEREBY STIPULATED AND AGREED that on or before June 8, 2005, after reviewing the Plaintiffs' RICO Statements concerning Mr. Jameel, the undersigned Defendant's counsel will notify the Plaintiffs if Mr. Jameel consents to file a consolidated motion to dismiss as the Plaintiffs have requested.

IT IS FURTHER HEREBY STIPULATED AND AGREED that if Mr. Jameel will not consent to submit a consolidated motion to dismiss after reviewing the Plaintiffs' RICO Statements, the parties will seek to reach a good faith resolution of this dispute regarding the issue of consolidated briefing and, in the event that no such resolution can be reached by June 15, 2005, the parties will request this Court's assistance in resolving this matter.

IT IS FURTHER HEREBY STIPULATED AND AGREED that, regardless of whether briefing of Mr. Jameel's motion to dismiss is consolidated, the time for Mr. Jameel to move, answer or otherwise respond to the Complaint in each of the cases referenced above, shall be on or before July 18, 2005.

IT IS FURTHER HEREBY STIPULATED AND AGREED that the Plaintiffs' response to Mr. Jameel's motion to dismiss the Complaints, if any, shall be served within forty-five days of receipt of same from defendant's counsel, and that defendant's counsel shall file reply papers, if any, within thirty days of receipt of plaintiffs' opposing papers.

Respectfully submitted.

COZEN O'CONNOR

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Attorneys for Defendant Yousef Jameel

SO ORDERED:

RICHARD CONWAY CASEY, U.S.D.J.

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